

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

STEPHEN GILL and MICHELLE GILL,
husband and wife,

Plaintiffs,

vs.

CASE NO.: 05-cv-10309-MLW

UNITED STATES OF AMERICA,

Defendant.

**MOTION FOR LEAVE OF COURT FOR *PRO HAC VICE*
ADMISSION OF PLAINTIFFS' COUNSEL**

Plaintiffs STEPHEN GILL and MICHELLE GILL, husband and wife
(collectively, "Plaintiffs"), by and through their undersigned counsel, and pursuant to LR,
D.Mass. 83.5.3, hereby move for this Honorable Court for leave to admit *pro hac vice*
Plaintiffs' counsel, Timothy J. Morgan, to represent Plaintiffs in this civil action, and as
grounds therefor state as follows:

1. Plaintiffs' counsel, Timothy J. Morgan, has represented the Plaintiffs attendant to their claims against the Government since Plaintiffs' claims were first presented to the Government pursuant to the Federal Tort Claims Act, 28 U.S.C. §§ 1346(b); 2401(b)-2402; 2671-2680, et seq. ("FTCA"). Accordingly, Mr. Morgan is intrinsically familiar with all issues related to this FTCA case.
2. In accordance with LR, D.Mass. 83.5.3(a), Mr. Morgan is a member of the bar of the United States Court of Appeals for the First Circuit; the United States District Court, District of Rhode Island; and the Supreme Court of Rhode Island.
3. In accordance with LR, D.Mass. 83.5.3(b), Mr. Morgan has certified that: (1) he is a member of the bar in good standing in every jurisdiction where he has been admitted to

practice; (2) there are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction; and (3) he is familiar with the Local Rules of the United States District Court for the District of Massachusetts. See Local Rule 83.5.3(b) Certification of Timothy J. Morgan attached hereto as Exhibit "A," and incorporated herein by reference.

4. The Clerk's fee, set forth in Appendix A, Local Rule 4.5 Supplement, for filing Plaintiffs' instant motion for leave to admit Mr. Morgan *pro hac vice* has been paid.

WHEREFORE, Plaintiffs STEPHEN GILL and MICHELLE GILL, husband and wife, respectfully request that this Honorable District Court grant their motion for leave of court for *pro hac vice* admission of Plaintiffs' counsel, Timothy J. Morgan, to represent Plaintiffs in this civil action, and enter an Order so admitting Mr. Morgan.

LOCAL RULE 7.1(a) CERTIFICATION

Pursuant to LR, D.Mass. 7.1(a), Plaintiffs' undersigned counsel states that he has conferred with counsel for Defendant UNITED STATES OF AMERICA regarding Plaintiffs' motion for leave of court for *pro hac vice* admission of Plaintiffs' counsel, Timothy J. Morgan.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this, the 22nd day of July 2008, I electronically filed the within document with the Clerk of Court by using its CM/ECF system which, in turn, will electronically transmit notice of the same to the following: United States Attorney's Office, 1 Courthouse Way, Suite 9200, Boston, MA 02210.

/s/ STEPHEN D. GILL

STEPHEN D. GILL

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Pro se Plaintiff and Attorney

for Plaintiff Michelle Gill

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UNITED STATES OF AMERICA,

Defendant.

LOCAL RULE 83.5.3(b) CERTIFICATION OF TIMOTHY J. MORGAN

I, Timothy J. Morgan, on this 22nd day of July 2008, hereby certify as follows:

1. I am a member of the bar of the United States Court of Appeals for the First Circuit; the United States District Court, District of Rhode Island; and the Supreme Court of Rhode Island.
2. I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice.
3. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.


TIMOTHY J. MORGAN

Rhode Island Bar No.: 5365

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